

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARVIN PEARLSTEIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

BLACKBERRY LIMITED (formerly known
as RESEARCH IN MOTION LIMITED),
THORSTEN HEINS, BRIAN BIDULKA,
and STEVE ZIPPERSTEIN,

Defendants.

No. 13 Civ. 7060 (CM) (KHP)
(Consolidated)

ECF CASE

**STIPULATION AND [PROPOSED] ORDER GOVERNING
SCHEDULING OF EXPERT DISCOVERY AND MODIFICATION OF
DEADLINE FOR COMPLETION OF DISCOVERY**

Lead plaintiffs Todd Cox and Mary Dinzik and additional plaintiffs Yong M. Cho and Batuhan Ulug (“Plaintiffs”) and defendants BlackBerry Limited, Thorsten Heins, Brian Bidulka, and Steve Zipperstein (“Defendants”), by and through their undersigned counsel, hereby jointly stipulate to the following schedule to govern expert discovery in this action, including extension by up to 15 days of the current deadline for completion of all discovery, subject to the Court’s approval:

Date	Event
August 15, 2019	Deadline for Plaintiffs to designate experts
September 17, 2019	Deadline for completion of fact discovery
September 17, 2019	Deadline for Plaintiffs to serve expert reports
October 18, 2019	Deadline for Defendants to serve expert reports

October 29, 2019	Deadline for Plaintiffs to serve reply expert reports
November 4-15, 2019	Expert depositions
November 15, 2019	Deadline for completion of expert discovery

STIPULATED AND AGREED BY:By: Kim E. Miller

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Counsel for Defendants

* * *

SO ORDERED.

Date: _____

Hon. Katharine H. Parker
United States Magistrate Judge